



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**JAN 15 2015**

Ref: 8EPR-N

Glenn P. Casamassa, Forest Supervisor  
Arapaho and Roosevelt National Forests and  
Pawnee National Grassland  
2150 Centre Avenue, Building E  
Fort Collins, CO 80526

Re: Pawnee National Grassland Oil and Gas Leasing Analysis  
Final Environmental Impact Statement, CEQ #20140350

Dear Mr. Casamassa:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service (USFS) December 2014 Final Environmental Impact Statement (EIS) for the Pawnee National Grassland (PNG) Oil and Gas Leasing Analysis. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

### **Background**

The PNG spans approximately 192,000 acres in Weld County, Colorado, approximately 35 miles east of Fort Collins and 25 miles northeast of Greeley. The last PNG leasing analysis was completed in 1997 and relied upon a 1995 Reasonably Foreseeable Development Scenario (RFD). A recently updated RFD projects up to 265 new wells on the PNG over the next 20 years. This decision, which will impact the PNG unleased federal mineral estate (approximately 100,000 acres), will identify lands that will be available on the PNG for oil and gas leasing and stipulations that will be included on any future leases. Since this is a programmatic analysis, site specific projects are not being considered or approved at this time.

The Final EIS identifies Alternative 3, No Surface Occupancy, as the USFS's Preferred Alternative and would designate all unleased lands on the PNG as administratively available for lease with a no surface occupancy (NSO) stipulation, i.e., no surface disturbance could occur on the PNG but oil and gas development activity could be located on lands adjacent to the PNG with access to federal minerals occurring horizontally. We support this unique approach as protective of the PNG's natural resources.

We have greatly appreciated the USFS's efforts to reach out to the EPA, other Federal agencies and the State of Colorado as it developed this EIS. In particular, the convening of the Air Quality Technical Workgroup (AQTW) to address air quality analysis needs satisfied the spirit of the 2011 "Memorandum of Understanding (MOU) Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the National Environmental Policy Act Process."



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We reiterate that continued collaboration among the federal and state agencies participating in the AQTW will help to protect air quality as projects move forward under this EIS.

With this in mind, we look forward to continued participation in the AQTW, or similar group, as future project level NEPA analyses are prepared by the USFS and the BLM under this EIS. Further, the EPA requests that we be advised when lease sales are offered in the future on the PNG. As we noted in our October 17, 2014 comments on the PNG Oil and Gas Leasing Analysis Draft EIS, we have assisted other federal agencies in understanding the aspects of our General Conformity Rule (40 CFR 93, Subpart B), and we are available to discuss general conformity issues and appropriate means to address the requirements.

We appreciated the opportunity to review this Final EIS. Please contact us with any remaining questions. You can reach me at 303-312-6704, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Philip S. Strobel  
Acting Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc: Keith Berger, Field Manager, BLM Royal Gorge Field Office